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Manual: Subcontractors Requirements

Change Number: 83535

## 1. PURPOSE

The Subcontractor Requirements Program was established to ensure a consistent and controlled method of providing requirements for subcontractors as they perform work at Idaho National Engineering and Environmental Laboratory (INEEL) facilities controlled by Bechtel B&W Idaho, LLC (BBWI).

## 2. APPLICABILITY

This program applies to individual BBWI suppliers or subcontractors that provide services in accordance with — and as specified by — BBWI subcontract, purchase order, or other Procurement documents.

## 3. PROGRAM OVERVIEW

The Subcontractor Requirements Program has been developed — based upon a specific policy, value, and set of goals — to prevent workplace injuries and to ensure consistent and high quality products and services produced.

This program provides a consistent approach to ensuring that all work is consistently accomplished in accordance with the BBWI applicable and stated requirements. When identified in the subcontract documents, this program eliminates the requirement for independent and unique programs that would otherwise be required for individual projects.

The Subcontractor Requirements Program consolidates BBWI requirements and expectations from various programs and disciplines to support the overall goal of the safe and efficient performance of subcontracted work. This program focuses primarily on the areas of environmental assurance (EA), safety and health (S&H), radiological control (RADCON), and quality assurance and oversight (QA&O). This program provides a mechanism for disseminating these elements — as they apply to work activity expectations — to subcontractors through the use of consistent methods and formats. The program specifies these work requirements through program requirement documents (PRDs) that provide subcontractors with BBWI requirements and references to applicable external regulations **with which** subcontractors are expected to comply when performing work for BBWI.

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## 4. PROGRAM ADMINISTRATION AND INTERFACES

### 4.1 Program Administration

The Subcontractor Requirements Program is a BBWI companywide program. The [Construction](#) Procurement Manager has overall management responsibility for the Subcontractor Requirements Manual. As such, the [manager](#) is responsible for determining what subjects shall be represented in the Manual.

A Subcontractor Requirements Steering Committee has been established to oversee the Subcontractor Requirements Program. This committee consists of at least one representative from each of the applicable functional areas, including:

- Safety and Health
- Environmental Affairs
- Environmental Restoration
- Radiological Control
- Quality Assurance & Oversight
- INEEL Institute
- Facilities/Utilities/Maintenance
- Construction Management
- Project Management
- Procurement
- the subcontracting community.

The Subcontractor Requirements Steering Committee coordinates the development of the Subcontractor Requirements Manual in order to ensure consistency in approach and language. This includes retaining control of all subcontractor PRD revisions, format changes, and additions or deletions. To ensure that revised contractual or regulatory requirements are incorporated into subcontractor PRDs, the committee also functions as the primary interface with BBWI personnel (see subsection 4.2).

Subcommittees are also established, as needed, to address issues specific to the EA, S&H, RADCON, and QA&O program elements. These subcommittees

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function in much the same manner as the Subcontractor Requirements Steering Committee.

The Construction Procurement Manager has the responsibility to coordinate the proposed changes to the Subcontractors Requirements Manual (SRM), as requested by the Subcontracts Requirements Steering Committee.

The Construction Procurement Manager has the responsibility to incorporate revisions to the SRM into active construction subcontracts under his/her purview, as appropriate. Other procurement managers shall have the responsibility to evaluate active subcontracts under their purview to determine the appropriate action relative to incorporating SRM revisions or not.

## **4.2 Program Interfaces**

Effective implementation of the Subcontractor Requirements Program requires extensive interfacing between the involved subcontractors and BBWI organizations.

The Subcontractor Requirements Steering Committee acts to ensure effective interface between the BBWI organizations and disciplines. The committee coordinates the implementation of subcontractor requirements and shares information concerning the development of, and changes to, requirements as they apply to subcontractor activities.

The individual disciplines and organizations also form committees as needed to analyze requirements and requirement changes associated with their respective disciplines, and to determine applicability to subcontractor work activities.

# **5. PROGRAM DESCRIPTION**

## **5.1 Subcontractor PRDs**

The subcontractor PRDs provide a consistent approach to ensuring that applicable requirements are passed down to a highly variable and transitional subcontractor work force. These PRDs — when identified in the subcontract documents — eliminate the requirement for independent and unique subcontractor expectation documents, which would otherwise be required for individual subcontractors.

This program and associated subcontractor PRDs have been developed to provide individual organizations with the necessary requirements for interfacing with BBWI organizations and meeting BBWI expectations. The subcontractor PRDs provide the necessary requirements to adequately interface with the approved BBWI procedures, or to establish a comparable management system that meets the objectives of BBWI.

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## 5.2 Primary Program Elements

The primary elements of the Subcontractor Requirements Program address S&H, EA, RADCON, and QA&O requirements as they apply to subcontractor activities at the INEEL.

Proper implementation of these program elements is essential to ensuring a safe workplace where employees produce high quality products and services. The management and employees of subcontractors working at the INEEL must have a “ZERO Injury” commitment. This commitment also applies to having zero:

- accidents involving property
- accidents causing chemical spills or releases to the environment
- unprotected exposures to hazardous materials above the ALARA or other permissible exposure limits
- work quality deficiencies, particularly regarding quality-affecting activities.

## 5.3 Hazard Prevention and Control

Effective hazard prevention and control requires a demonstrated commitment from a partnership of subcontractor and BBWI employees and management to proactively recognize and minimize hazards; ultimately creating a workplace free of injuries and illnesses. The safety and health process and the “Safety and Health Value” must be integrated into all aspects of INEEL work activities. Employees who embrace the “Safety and Health Value” actively care for both their own safety and for [the safety](#) of others.

The hierarchy that has been established for mitigating hazards is (1) engineering controls, (2) administrative controls, and (3) the use of [Personal Protective Equipment \(PPE\)](#). Hazard prevention and control is addressed through both preventative and corrective measures; the first being worksite analysis, the second being accident and incident investigations.

Worksite analysis (work hazard evaluation) provides a mechanism for identifying and mitigating worksite hazards. The requirements for worksite analysis are addressed in PRD-1007, Work Coordination and Hazard Control.

Accident and incident investigations are conducted to determine and correct root causes. Subcontractor supervision is required to investigate any accidents, incidents, or near misses that may occur within their area(s) of responsibility. In addition, subcontractor personnel are required to assist any associated BBWI or DOE investigation. The subcontractor must provide immediate notification to the

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BBWI [Point of Contact \(POC\)](#) (or within one hour of the incident) and must complete form 5484.3, Individual Accident/Incident Report, within 24 hours of the accident or incident.

As an additional corrective action, subcontractors are required to develop a disciplinary action plan for violators of EA, S&H, RADCON, and QA&O requirements.

#### 5.4 Reporting and Resolving Safety Concerns

Subcontractor employees not only have the right, but also have the responsibility, to respond to unsafe conditions, unsafe behaviors, and near misses. When an imminent danger situation exists, the employee must immediately stop the work and perform necessary follow-up actions in compliance with PRD-1004, Stop Work. When a situation does not warrant stopping work, the employee should try to correct the situation on the spot, using immediate resources.

When reporting a situation, the employee should seek resolution (via person-to-person communication, telephone message, or the area employee input form) in the following sequence:

- immediate manager or supervisor
- safety representative
- subcontractor upper management
- safety team member
- BBWI POC or safety representative
- BBWI Employee Concerns Program (526-0333)
- DOE Employee Concerns Program (526-7200).

The individual receiving a [safety concern of imminent danger](#) is required to enter the report into the Issues Communication and Resolution Environment (ICARE) so that the concern is tracked to resolution. When the employee reporting the concern provides their identification, resolution is shared with that employee. When identification is not provided, the resolution is posted in the affected area.

#### 5.5 SRM Notices as follows:

The SRM Notices will provide useful information in the areas of EA, S&H, RADCON, and QA&O and will be posted on the Procurement Homepage. The

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notices are a method of providing timely feedback to the subcontractors at the INEEL.

## 6. SUBCONTRACTOR RESPONSIBILITIES

### 6.1 Subcontractor Senior Management Responsibilities

Subcontractor senior management has the ultimate responsibility for implementing the elements of the Subcontractor Requirements Program by:

- promoting the values and goals as stated in the contents of this program
- establishing and implementing risk assessments to preserve employee health and well-being against occupational hazards
- establishing and maintaining a motivational climate that encourages employees to fulfill their responsibilities and to fully participate in employee involvement activities
- establishing and maintaining a program that recognizes employees who follow safe and healthful work practices and perform high quality work
- ensuring that the contents of the DOE VPP and BBWI QAPD are implemented and maintained
- providing and maintaining necessary funding and equipment for effective EA, S&H, RADCON, and QA&O programs
- ensuring the proper posting of worker protection and employee rights and responsibilities documentation
- establishing a system that allows employees to report EA, S&H, RADCON, and QA&O concerns and ensures timely assessment and resolution
- promoting; supporting; participating with; and actively addressing recommendations of EA, S&H, RADCON, and QA&O committees
- establishing and enforcing a disciplinary action policy for employees who willfully or negligently violate program procedures, activities, or standards
- ensuring that employees are not subject to discrimination or reprisal for executing good faith activities or assigned functions
- ensuring that program requirements are passed down to subtier contractors

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- ensuring that equipment, processes, and services meet BBWI requirements.

## 6.2 Subcontractor Field Supervision Responsibilities

Subcontractor field supervision is expected to support senior management in implementing the EA, S&H, RADCON, and QA&O programs, with supervisors having the first line of responsibility. Field supervision will implement the programs by:

- supporting the INEEL subcontractor drug-free workplace policy
- identifying hazards associated with activities and controlling or eliminating those hazards when planning and executing work
- identifying and evaluating potential hazards and potential process or program deficiencies associated with each aspect of a project
- assigning and communicating safety roles, responsibilities, and accountabilities to employees
- ensuring that employees are cognizant of hazards in their workplaces and adjacent areas, and that they understand their assigned duties
- notifying the BBWI point-of-contact (POC) of any stop work action
- ensuring that the conditions of a work stoppage are appropriately investigated and documented
- conducting surveillance of work environments
- investigating and tracking incidents, nears misses, and errors; determining causes; taking corrective actions to prevent recurrence; and performing trend analyses
- ensuring that identified deficiencies are tracked to closure
- following administrative procedures to enforce disciplinary action when program requirements or instructions are violated
- notifying employees of any pertinent health exposure information
- ensuring employees are enrolled in applicable medical surveillance activities
- ensuring that a high standard of housekeeping is maintained

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- providing employees with appropriate and adequate instruction in:
  - stop work authority
  - employee rights and responsibilities
  - job duties and hazards
  - safety notification process
  - accident prevention aspects of each job
  - use, issue, storage, and disposal of PPE
  - use of materials, tools, and equipment
  - alarm initiation and response
  - emergency reporting
  - evacuations
  - fire extinguisher use
  - disciplinary action plan
- conducting pre-job briefings and plan-of-the-day (POD) meetings
- participating in monthly subcontractor safety meetings
- ensuring that work is conducted in accordance with work directions in a safe and healthful manner
- addressing safety hazards and work quality deficiencies that are identified by employees and responding in a timely manner
- making appropriate notifications to the BBWI POC for occupational injury, illness, near miss, unplanned exposure, or work quality deficiency
- ensuring that personnel can perform their work tasks safely and effectively within the confines of any temporary or permanent work restrictions
- verifying that employee training is appropriate and current for the work activities to be performed.



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### 6.3 Subcontractor Employee Responsibilities

Subcontractor employees are expected to take responsibility for their own health and safety, for the safety of fellow employees, and for the quality of the products and services they produce by:

- recognizing and reporting hazards and work quality deficiencies
- using and maintaining tools, equipment, and PPE in the prescribed manner
- stopping work in situations of clear and present danger and reporting the situations to supervision
- practicing good housekeeping in assigned work areas
- working within the constraints of Subcontractor Requirements Program requirements, hazard evaluations, and approved work control documents
- participating as required in medical surveillance programs
- immediately reporting to direct management any occupational injuries, illnesses, near misses, potential exposures to hazardous agents, or work quality deficiencies
- immediately reporting to direct management any non-occupational injury, illness, or condition that might affect or limit employee capability to safely perform assigned job duties
- participating in:
  - safety committees
  - safety meetings
  - worksite inspections and hazard evaluations
  - POD meetings
  - weekly tool box safety meetings
- requesting any needed information about hazards in the workplace
- conforming to the requirements of a drug free workplace.

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## 7. SUBCONTRACTOR TRAINING REQUIREMENTS

Subcontractors must provide training to their personnel to ensure that they are aware of:

- the hazards in the subcontractor-controlled workplace
- how workplace hazards are controlled
- worker responsibilities associated with the products and services they provide.

Training may be general, site-specific, or task-specific, depending on the level of awareness and competency required.

Subcontractor management and supervision must receive documented training to enhance their roles in implementing the Subcontractor Requirements Program.